

From: "Liu, Jing \ (ECY)" <JLIU461@ECY.WA.GOV>
To: "Hale, Elly" <Hale.Elly@epa.gov>
CC: "Huybregts, Jessica (ECY)" <HUYJ461@ECY.WA.GOV>
Date: 9/29/2021 9:19:34 PM
Subject: RE: Pre LDWG call
Attachments: [2021-04-26 FINAL Former Rhone Poulenc Pre-CMS Data Collection Work Plan.pdf](#)

Hi Elly,

Just want to follow up on dioxins. During our talk today, you mentioned a former incinerator located at the northwest corner at R/P, which could have contributed to the high dioxin concentrations detected in the sediment. That makes sense.

I don't know if you have seen this report yet, see attached - "The Final Pre-CMS Data Collection Work Plan - FORMER RHONE POULENC SITE" dated April 2021. I just saw it today, Page 9 of the report talks about this incinerator. It states:

"Preliminary reporting provided by EPA showed dioxins/furans and PCBs were recently detected in sediments as part of design investigations being performed as part of the Lower Duwamish Waterway Superfund cleanup. A former incinerator was identified in historical drawings as being present at one point near the shoreline north of the site (Figure 3 [Location 41])."

Also I found something interesting in this report, which might help us find another potential source of dioxins. I'm not aware that there is a pentachlorophenol handling area at this site until I saw this report. The above work plan has proposed to test dioxins in a couple of wells. Table 1 of the report under the rationale for testing dioxins at MW-38R says "Sampled semi-annually as part of the PMP. Near the vicinity of former incinerator reported in the 1990 RFA, as being north of this area. PCBs detected in shallow soils nearby in 2015 and is near the shoreline. Located relatively near historical "pentachlorophenol handling area" of site, as identified in the 1990 RCRA Facility Assessment and closer to shoreline." The report doesn't say whether pentachlorophenol was manufactured or was just used at this site, but we know that the presence of pentachlorophenol is always associated with its byproduct of dioxins. It'll be great if we can find a copy of this 1990 RCRA report so we can get some better idea about the location of this "pentachlorophenol handling area".

I haven't got time to look at Paccar and BIT yet, but I'm planning to do it. I'll share with you if I find anything interesting.

Hope we can have some good discussions with LDWG tomorrow on the Tier II sample selections.

Jing

From: Liu, Jing (ECY)
Sent: Tuesday, September 28, 2021 5:01 PM
To: Huybregts, Jessica (ECY) <HUYJ461@ECY.WA.GOV>; Hale, Elly <Hale.Elly@epa.gov>
Subject: RE: Pre LDWG call

Hi Elly,

Thanks for inviting me for the discussion. I think I can attend the first hour then I have to take off to get ready for another meeting in the afternoon. There is just too much going on at this time. I don't think I would have adequate time to dive in to the data this week, but I'm still planning to attend the discussions with LDWG and listen. I feel I always can learn something new from the discussions. Anyway, I'm hoping that I can have more time to go through the data thoroughly and fully prepare for the future discussions on Phase III data need.

Hi Jessica,

Thanks for your input. I feel LDWG should be more conservative in the sampling design not only at those socially sensitive areas, but also at those hot spot areas. We definitely don't want to see what has happened at EJ is going to happen in some areas of Upper Reach. LDWG should consider going beyond what the ROD has required to address contamination at depth in those hot spot areas. The concentrations of both PCBs and dioxins are very high adjacent to Rhone Poulenc both at surface and at depth, and the distribution seems patchy. Dioxin has not been identified as a COC at Rhone Poulenc upland, and it's not clear where the dioxins in the sediment come from. I'm a little bit concerned about potential recontamination in this area after cleanup if we can't figure out the source. Maybe we never can figure it out, but I think LDWG should put more efforts in this area. I can brief you after the discussion with Elly and her team tomorrow if we come up with anything that needs your attention. Thanks!

Jing

-----Original Appointment-----

From: Huybregts, Jessica (ECY) <HUYJ461@ECY.WA.GOV>

Sent: Tuesday, September 28, 2021 3:05 PM

To: Hale, Elly

Cc: Liu, Jing (ECY)

Subject: Declined: Pre LDWG call

When: Wednesday, September 29, 2021 11:30 AM-1:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Microsoft Teams Meeting

Hi Elly,

Thanks for Cc'ing me. I won't be able to make it because my Tuesday through Thursday were already booked with other meetings and field visits. Thankfully Jing is a great rep for ECY.

The biggest concerns I have are:

1. Some of the statements Kathy/LDWG expressed are inconsistent (i.e., first the data are patchy, then we can assume it's all the same between A and B) and I don't know how you will be able to feel confident with their delineations.
2. How do we know what's at depth if we didn't sample it for horizontal delineation (what you brought up at the beginning today)?

Regarding Erika's big picture concerns, I think they are valid and LDWG needs to hear it, but the thought that came into my head was "Elly is never going to let LDWG get away with things like that."

Kathy G. is skilled at moving forward with the technical discussion and getting decisions locked down, but consultants like Windward have very limited understanding of the community context for which this remedial work will be conducted. Please ensure there is enough time to state the important points like "you may wish to be more conservative in sampling design around the Duw. R. People's Park and other locally/socially important areas" and anything important to the EJ community. It's in LDWG's best interest to consider those social/EJ elements when they analyze technical components.

Jing – It is likely that LDWG will blame source control (i.e., ECY) at their first opportunity, post-remedy. So it is in ECY's best interest to ensure that there are enough data collected in these phases so we feel confident to say that if there is some recontamination, that it was a current/ongoing source from the uplands. Obviously we don't want recontamination to occur and will do everything we can to avoid that, but if they want/intend to say it's upland sources to blame then LDWG must prove that they are not leaving contamination in place. Remember, there is a poor track record in general at the EAAs. LDWG, especially King County like to tout their early work on the EAAs, but in many cases they did not remove all of the contaminated sediment and had to go back in, either deeper, or to the side of the original delineated area.

Good luck to you all in the discussion.

Jessica